

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

JASPER WIRTSHAFTER, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:24-cv-754-RLY-MJD
	)	
PAMELA WHITTEN, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**Unopposed Motion for a Five-Day Extension to File Reply Memorandum in Support  
of Motion for Preliminary Injunction**

Plaintiffs, by counsel, state that:

1. On February 28, 2025, defendants filed their Response in Opposition to Preliminary Injunction. (Dkt. 85).
2. Pursuant to this Court's Order of February 21, 2025 (Dkt. 77), plaintiffs' reply memorandum is due by March 7, 2025.
3. Due to the press of other responsibilities, plaintiffs' counsel need an additional five days to file their reply memorandum.
4. Undersigned counsel is the lead counsel in this matter. Among other things, undersigned counsel has had to spend time drafting discovery and other documents in the case of *Pride Center of Terre Haute, Inc. v. President, Indiana State University*, No. 2:25-cv-76-MBP-MJD, which is on an expedited schedule because of a preliminary injunction motion. Counsel also had to unexpectedly spend time drafting a response memorandum

in opposition to a motion to file a surreply in *Cordellioné v. Commissioner, Indiana Department of Correction*, No. 3:23-cv-135-RLY-MJD.

5. Additionally, undersigned counsel is occupied with appointments and other office-related matters for much of the week.

6. Undersigned counsel has communicated with John Maley, attorney for defendants, who has graciously indicated that defendants have no objection to a five-day extension.

WHEREFORE, plaintiffs request a five-day extension, to and including March 12, 2025, to file their reply in support of their motion for preliminary injunction, and for all other proper relief.

Kenneth J. Falk  
ACLU of Indiana  
1031 E. Washington St.  
Indianapolis, IN 46202  
317/635-4059  
fax: 317/635-4105  
kfalk@aclu-in.org

Attorney for Plaintiffs